



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

August 25, 2021

**BY ECF**

The Honorable Loretta A. Preska  
United States District Judge Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: *United States v. Adelekan, et al.*, 19 Cr. 291 (LAP)**

Dear Judge Preska:

Pursuant to the Court's order at the August 20, 2021 status conference, the Government respectfully proposes the schedule below. The Government first provided a proposed schedule to defense counsel on Friday, August 20, 2021. Counsel for Mr. Adelekan, Mr. Omotayo, Mr. Olajumoke, Mr. Adebogun, and Mr. Lucas have consented to the proposed schedule. Counsel for Mr. Oyeneyin objects to the proposed schedule. The Government has not heard back from counsel for the other defendants.

Proposed Motions *in limine* Schedule

September 13, 2021: Affirmative motions in limine  
September 23, 2021: Opposition to motions in limine  
September 27, 2021: Replies<sup>1</sup>

Proposed Request to Charge ("RTC") Schedule

October 1, 2021: Government to send defense counsel Government's proposed RTC  
October 5, 2021: Defense counsel to serve objections regarding Government's RTC  
October 11, 2021: Parties submit to Court proposed RTC and joint letter regarding areas of dispute

The schedule proposed above is approved.  
SO ORDERED.

*Loretta A. Preska* 08/26/2021

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

By: /s/  
Daniel H. Wolf / Rebecca T. Dell  
Assistant United States Attorneys  
(212) 637-2337 / 2198

cc: All defense counsel of record (by ECF)

<sup>1</sup> The Government take no position on whether the Court allows for replies.